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DEC 05 2019

THOMAS G. BRUTIN  
CLERK, U.S. DISTRICT COURTUnited States District Court  
Northern District of IllinoisSamson Uboh,  
Plaintiff

V.

Chicago State Pharmacy school,  
Defendant

1:19-cv-07972

Judge Manish S. Shah

Magistrate Judge M. David Weisman

COMPLAINT

1. In Spring semester 2018, I was unfairly dismissed without any chance to repeat my classes as it was written in the handbook. The academic standing committee made a false allegation against me that I had repeated and was on probation prior to failing two classes from that semester. In which I appealed to the office of then Dean (Dr. Coleman) that the reason that Drs. Newaz and Gentry (as the spear headed leaders of the committee) dismissed me was unfounded. I was able to prove to her that I had none of those criteria they based the dismissal upon. To prove my point, I sent her a certified email that the former academic standing committee sent to me before leaving the school. In Fall semester 2017, when I got my first D-grade from DMTM 1, Dr. Rakah sent me an email that since I got a D-grade in DMTM 1 in Fall semester 2017, would automatically put me in academic warning and not probation and that failure to get a C-grade or above in any class in coming spring semester 2018 would put me on probation. Dr. Coleman, after investigating the matter, decided to uphold my appeal on the dismissal letter from academic standing committee and allowed me to repeat P-3 year. She said that I had neither repeated nor on probation prior to failing those two classes. Ever since I was allowed to repeat, I noticed that I was always picked on including fellow students. I had to fight for what many students get freely.
2. In Fall 2018, when I took DMTM 1 the second time, to prove my claim that I was picked on and discriminated by professors and alike, I was rejected by all the students in a group assigned to me and the Dr. Reddy did nothing but rather put me by myself. Since the pharmacy school in Chicago State University started, nobody had done this course (DMTM 1) by themselves. Dr. Reddy has the power and authority as the coordinator of the course and also the facilitator of the group that she initially assigned me to, to call to question their discrimination towards me and put an end to it. The class had a minimum of 15 groups of 4-5 students in each group. While other students were working together I was made to work alone without considering the fact that we paid equal tuition for

the class. Dr. Reddy did not give me the chance to join another group, perhaps one of them may have accepted me. So I did the three soap notes, two presentations and one journal club research paper by myself, which was unfair and rubbed me the chance of studying better in my exams. Nobody in that group got less than a C-grade, and it was only me that got a D-grade because the least grade any of the groups under her (which was four groups of five students each and me) was 90% in all and gave me 81% in all. The funny aspect of it was that, when I passed the second part (DMTM 2) in Spring semester 2019, which was coordinated by a different professor, some of them that easily passed DMTM 1 could not pass it because DMTM 2 was a lot harder and coupled with the fact that the DMTM2 professor gave me a zero from the get go because he put a different patient in my chart and after I had finished treating it he assigned a zero to me. Whereas he forgot that that same thing had happened to one of the student but rather he told him that he can only grade off of the disease state the student treated.

3. When I got the second D-grade in DMTM 1 in Fall 2018, academic standing committee called me for questioning and I told them all that happened during that semester, how the group rejected me and Dr. Reddy taking their side and punished me by making me to do all the works by myself. Their response was that, they were not concern of nothing else but a student grade, that another committee handles that. The next day they sent me a dismissal letter the second time. I appealed to the grievance committee regarding how I was treated. In January 2019 the meeting was held before the spring semester started in January 11. While the semester was on course, Dr. Rose said, since the appeal was in progress that I should keep my classes. According to school handbook, a decision supposed to be reached within a window of 30 days but instead it took 4 months and half. It was in May 10<sup>th</sup> after the semester ended and I had passed all the classes that I failed previously (DMTM 2 and DAST 8) that I received a letter from the chair of grievance committee (Dr. Fields) that my appeal was dismissed, that I failed to prove that I was treated differently. The following day I was withdrawn from final year (P-4year) rotation (clinical), after I have completed all school courses but the clinical to complete my PharmD. program.
4. Misleading practices: Furthermore, I did not know that I was given an incomplete course work to register for in April 2019 for P-4 Clinical courses until I went to financial aid in May 2019. One of the official said that I did not register for enough credit hours to qualify for financial aid. At first, I was confused, and I said, I did. Little did I know that the course that pharmacy department assigned to me through the pin was incomplete course. During that period, I learnt that Dr. Gentry and Newaz had predetermined my discontinuation from the program prior to the end of the semester. When I went to the office of the assistant provost, that was when I found out that my file was in his office. The first thing he said was you have been dismissed before but the then Dean (Dr. Coleman) brought you back. But I said not for a favor, because it took the Dean's intervention to do what was right before I was given the chance to do what others get easily. When Dr. Gentry became the new interim Dean, He quickly acted on his



predictions against me. So at the end of the spring semester 2019, after the school had exploited all my money of a minimum of \$220,000 in loans and I had successfully completed all classroom requirement, the department stopped me even though they allowed other students that were in exact situation (repeated a year and had a D-grade before P-4) like mine to continue to rotation because you can graduate with a D-grade that I had.

5. This court has a jurisdiction over this case because the United States Code: US Civil: 20 USC 1703, which stands against denial of equal educational opportunity and the damaged done to me was above the minimum dollar value listed. I'm requesting that the court should under careful consideration order the defendant to pay me the amount of 350,000 for exploitation. I had but less than 10 months' hospital visit to graduate and they took me out.

Signature.....

Samson Uboh  
720 E 82<sup>ND</sup> Street  
Apt(3c)  
Chicago IL 60619